

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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ELMER ROMERO, KEVIN OCHOA, and ALIRIO PEREIRA,
individually and on behalf of all others similarly situated,

Civil Action No. 20-cv-04378

Plaintiffs,

-against-

GYK DRYWALL, INC., CEIBA SERVICES LLC,
ALLSTATE INTERIORS, INC., and DANILO VALLE,

Defendants.

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NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Declaration of Adam Sackowitz, the Declarations of Elmer Romero, Kevin Ochoa, and Alirio Pereira, the Memorandum of Law in Support, and the exhibits attached thereto, plaintiffs Elmer Romero, Kevin Ochoa, and Alirio Pereira (“Plaintiffs”) will move before the Hon. Freda L. Wolfson, United States District Judge, in the United States Courthouse located at 402 East State Street, Trenton, New Jersey 08608, on March 15, 2021 at 9:30 a.m., or on a date and time to be set by the Court, for an Order pursuant to F.R.C.P. 55:

- (1) granting Plaintiffs a default judgment against defendants GYK Drywall, Inc., Ceiba Services LLC, and Danilo Valle on all claims asserted by Plaintiff against GYK Drywall, Inc., Ceiba Services LLC, and Danilo Valle in this matter;
- (2) awarding Plaintiffs all relief requested and available, including all damages, liquidated damages, interest, costs, attorneys’ fees and disbursements against GYK Drywall, Inc., Ceiba Services LLC, and Danilo Valle; and
- (3) for such other and further relief as the Court deems just and proper.

Pursuant to F.R.C.P. 6 and Local Civil Rule 7.1, any response and opposition to this motion is due to be served on or before March 1, 2021, and Plaintiffs' reply, if necessary, is due to be served on or before March 8, 2021.

Dated: New York, New York
January 22, 2021

Respectfully submitted,

/s/ Adam Sackowitz
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